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**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN MARIANA ISLANDS**

TIANMING WANG, *et. al*,

Plaintiffs,

v.

GOLD MANTIS CONSTRUCTION
DECORATION (CNMI), LLC, *et. al*,

Defendants.

Case No. 18-cv-0030

Hearing Date: _____
Hearing Time: _____
Judge: Hon. Ramona V. Manglona

**PLAINTIFFS' NOTICE OF COUNTER-MOTION AND COUNTER-MOTION FOR
A DECLARATION THAT PRIVILEGE HAS BEEN WAIVED**

NOTICE

Please be advised that, on _____, 2021 at _____ a.m./p.m., the Court will hear Plaintiffs' counter-motion pursuant to Fed. R. Civ. P. 26 for a declaration that Ms. Lijie Cui has waived any privilege concerning her communications with Mr. Lizama, including the emails produced by Mr. Lizama in response to Plaintiffs' valid subpoena, relating to her ESI Data or compliance with the Court's orders regarding the preservation of evidence.

MOTION

Plaintiffs hereby move the Court pursuant to Fed. R. Civ. P. 26 for a declaration that Ms. Lijie Cui has waived any privilege concerning her communications with Mr. Lizama, including the emails produced by Mr. Lizama in response to Plaintiffs' valid subpoena, relating to her ESI Data or compliance with the Court's orders regarding the preservation of evidence. This counter-motion is supported by the concurrently filed Memorandum of Law in Support of Plaintiffs' Opposition to Lijie Cui's Motion for a Protective Order and Plaintiffs' Counter-Motion, the Declaration of Aaron Halegua, dated August 1, 2021, the Declaration of Fely P. Forbes, dated July 26, 2021, and the Declaration of Jonathan Langton, dated July 27, 2021.

DATED: August 2, 2021.

_____/s/
Aaron Halegua
Bruce Berline

Attorneys for Plaintiffs